

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

April 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON MATTHEW MCDOWELL,
aka "Johnathan Wells,"
aka "Matthew McDowell,"
aka "Robert Bullard,"
aka "Snake," and
EMMA CATHERINE JOSEPH,
aka "Emma Catherine
Bromley,"

Defendants.

No. 8:23-cr-00031-FWS

I N D I C T M E N T

[18 U.S.C. § 1708: Mail Theft and
Possession of Stolen Mail; 18
U.S.C. § 981, 28 U.S.C. § 2461(c):
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1708, 2(a)]

[ALL DEFENDANTS]

On or about December 22, 2021, in Orange County, within the
Central District of California, defendants JASON MATTHEW MCDOWELL,
also known as ("aka") "Johnathan Wells," aka "Matthew McDowell," aka

1 "Robert Bullard," aka "Snake," and EMMA CATHERINE JOSEPH, aka "Emma
2 Catherine Bromley," each aiding and abetting the other, stole, took,
3 and abstracted mail and mail matter from and out of a mail route and
4 authorized depository for mail matter, namely, a United States Postal
5 Service delivery truck, and from a letter and mail carrier, with the
6 intent to deprive the owners of the mail and mail matter, temporarily
7 and permanently, of its use and benefit.

COUNT TWO

[18 U.S.C. §§ 1708, 2(a)]

[ALL DEFENDANTS]

On or about December 23, 2021, in Orange County, within the Central District of California, defendants JASON MATTHEW MCDOWELL, also known as ("aka") "Johnathan Wells," aka "Matthew McDowell," aka "Robert Bullard," aka "Snake," and EMMA CATHERINE JOSEPH, aka "Emma Catherine Bromley," each aiding and abetting the other, unlawfully possessed mail and mail matter that had been stolen and taken from the United States mail, namely, approximately 17 pieces of mail and mail matter addressed to various individuals within Orange County, and elsewhere, and at that time and place, defendants MCDOWELL and JOSEPH knew that said mail and mail matter were stolen.

COUNT THREE

[18 U.S.C. §§ 1708, 2(a)]

[ALL DEFENDANTS]

On or about March 23, 2022, in Los Angeles County, within the Central District of California, defendants JASON MATTHEW MCDOWELL, also known as ("aka") "Johnathan Wells," aka "Matthew McDowell," aka "Robert Bullard," aka "Snake," and EMMA CATHERINE JOSEPH, aka "Emma Catherine Bromley," each aiding and abetting the other, unlawfully possessed mail and mail matter that had been stolen and taken from the United States mail, namely, approximately 233 pieces of mail and mail matter addressed to various individuals within Los Angeles County, and elsewhere, and at that time and place, defendants MCDOWELL and JOSEPH knew that said mail and mail matter were stolen.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

[ALL DEFENDANTS]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendants' convictions of the offenses set forth in any of Counts One through Three of this Indictment.

2. The defendants, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).


3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendants, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendants, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

/s/
Foreperson

E. MARTIN ESTRADA
United States Attorney


Scott M. Garringer
Deputy Chief, Criminal Division For:

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

BENJAMIN R. BARRON
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